

EXHIBIT 11

Gary A. Stumpf

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:Master File No.

In re: Methyl Tertiary Butyl Ether :1:00-1891

("MTBE") Products Liability Litigation:Medical No. 1358

:(SAS) M21-88

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Washington, D.C.

March 22, 2007

Video Deposition of

GARY A. STUMPF

called for examination pursuant to notice of deposition, on Thursday, March 22, 2007, at the law offices of McDermott Will & Emery, 600 13th Street, NW, Washington, D.C., at 12:15 p.m., before DANIEL W. HAWKINS, a Notary Public within and for the District of Columbia, when were present on behalf of the respective parties:

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1 them, you can answer them; if you don't understand them, you
2 can ask him to rephrase.

3 THE WITNESS: Okay.

4 BY MR. WALSH:

5 Q In 1985, were there components that Mobil
6 instructed its consultants to look for, to test for?

7 MR. PARKER: Objection.

8 THE WITNESS: I don't know.

9 BY MR. WALSH:

10 Q In retaining or hiring consultants for
11 groundwater testing, would the scope of their examination be
12 information that Mobil would be aware of at the time they
13 did testing; i.e., omega company is conducting the test for
14 the following compounds in every sample that it tests.

15 MR. PARKER: Objection.

16 THE WITNESS: I believe so.

17 BY MR. WALSH:

18 Q Did there come a time, and we can use from 1975
19 forward so that it's pretty much covered in the scope of it,
20 where Mobil recommended to outside consultants to include
21 MTBE and the compounds for which it would test?

22 A You said from 1975 forward. Anytime after 1975
23 is the question?

24 Q Yes; did there come a time when Mobil -- and the

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1 time frame is really just to put -- you can put 1860 -- by
2 1975 no one is effectively using it. So, did there come a
3 time when Mobil recommended to its outside consultants to
4 start testing for the presence of MTBE, include the testing
5 for MTBE in its samples?

6 A Yes.

7 Q And when did that happen?

8 A It varied around the country.

9 Q Okay. Do you know when that happened specific to
10 the Northeast section of the United States?

11 A I believe around -- by interview of our ESL lab,
12 they confirmed that they routinely were testing in 1991 for,
13 and reporting MTBE. And we were starting to send samples
14 to the lab that was starting up at that time.

15 I believe before then we were testing, and I
16 don't know if it was every site we tested for MTBE, but I
17 believe outside labs were running methodologies that would
18 analyze for MTBE and were routinely reporting it. Sometime
19 around that, early 1990s.

20 Q All right. You indicated before that it varied
21 by location within the country.

22 A Yes.

23 Q Was there a reason for that?

24 MR. PARKER: Objection.